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PROPOSED RULE **PR 50-52**
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REF: JDF 02-025

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Anthony W. Markley, Mail Stop O-11F1

Subject: Proposed Rule Change for CAMS Hydrogen and Oxygen Analyzers, from Safety Grade to Commercial Grade.

Reference: SECY-02-0080, Reg. Guide 1.97, DG-1117

Four questions are posed following review of the referenced documents and discussion of their contents with users of our systems.

Rule Change. Our understanding of the changes presented in DG-1117 (Approach 1 described in SECY-02-0080) is as follows:

Cam Hydrogen Analyzers - Downgrade from Safety Class Category 1 to Category 3. The analyzers must function correctly and continuously following a "beyond design basis accident" and may be procured as a commercial grade item. Warm up time has been extended from 30 minutes to 90 minutes (excluding time to calibrate).

Cam Oxygen Analyzers - As described for the hydrogen analyzers except the change will be to Category 2. Category 2 requires the instrument to be qualified per 1.89.

Areas of relief the proposed change will provide include:

- Removes the analyzers from the technical specification.
- Eliminates seismic qualification provided the analyzers are not part of a safety-related system.
- Relieves documentation burden including detailed equipment traceability.

Tasks that must be completed to take advantage of the proposed change are to address the isolation required between 1E and Non-1E systems.

- Input Power will need to be changed to a less critical source, Category 2, for both analyzer types or isolation inserted between the analyzers and 1E power supplies.
- Isolation will need to be added between the analyzer output signals and any safety related monitoring devices.

Template = SECY-067

SECY-02

It is assumed that the utilities will require evidence that replacement monitors, both hydrogen and oxygen, are compatible with post-accident conditions. It is also noted that Approach 2 of SECY-02-0080, eliminating the hydrogen analyzers, has been screened out as an option.

Is our understanding of the proposed rule change correct?

Grab Samples. The hydrogen (and oxygen analyzers for BWR plants) will be required to provide the specified "continuous" monitoring capability post-accident. A statement in the Federal Register, page 65021, indicates the NRC sees value in maintaining a capability for obtaining grab samples for complementing the hydrogen monitors. Since the proposed requirement specifies continuous monitoring, are we correct in concluding a grab sample capability cannot replace the monitors?

Containment Boundary. While extracting sample from containment, the analyzer sample loops become part of the containment boundary. Can we expect additional requirements beyond commercial grade to be imposed on the analyzer pressure retaining components?

Redundant Monitors. Although 1.97 does not impose the "no single failure" requirement for Category 2 and 3 equipment, would providing 2 trains of equipment be an appropriate solution for ensuring analyzer availability requirements are satisfied for Category 2 and 3? For reference, the requirements as they relate to equipment availability are believed to include the following:

Category 2 Oxygen Analyzers	"Out of service interval" does not exceed the corresponding interval for the system it serves (Containment Inerting).
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Category 3 Hydrogen Analyzer	Indication shall be continuously available.
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Your time during our recent telephone conversations and consideration of the preceding questions are greatly appreciated.

Sincerely,



Jerry Fuller
Project Engineer, Analytical Systems